

Hon. Margo K. Brodie  
United States District Court  
225 Cadman Plaza East, Brooklyn, NY 11201

January 7, 2022

**Re: *NASL v. USSF and MLS, No. 1:17-cv-05495***

Dear Chief Judge Brodie:

I write on behalf of Plaintiff North American Soccer League, LLC (“NASL”) in the above-referenced litigation. During the leadup to dispositive motions in this case, because those motions would take many months to brief and be decided, the parties stipulated to a delay in the normal process for beginning trial preparations under Your Honor’s Individual Rules, under which, “within 60 days from the date for the completion of discovery in a civil case, the parties shall submit to the court a proposed pretrial order.”<sup>1</sup>

As the dispositive motions have been fully briefed and are currently pending before the court, NASL respectfully proposes that an initial pretrial conference be set for approximately two weeks after the motions are decided, so that trial preparations can begin on a timely and informed basis and so that a place can be obtained in the Court’s busy calendar. At the conference, NASL expects it may be necessary to discuss issues relating to the date, length, and scope of the trial, based on the outcome of the parties’ pending motions. NASL believes it would be most efficient to have such an initial discussion with the Court about these issues before the parties begin to prepare a proposed pretrial order as described in the Court’s Rules § 4.A.

NASL further proposes that the parties be directed to meet and confer about such trial preparation issues in advance of the pretrial conference. We expect this would help ensure that the parties present the Court joint proposals on these issues to the extent possible, and help determine any disputed issues regarding the trial that would require resolution.

Respectfully submitted,

By: s/Jeffrey L. Kessler  
Jeffrey L. Kessler

cc: All counsel of record (via ECF)

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<sup>1</sup> § 4.A; ECF No. 246 at 2 (“[T]he due date for any proposed pretrial order under this Court’s Individual Rule 4.A shall be determined at a later date.”).